

1 AARON D. FORD
Attorney General
2 BRANDON R. PRICE
Senior Deputy Attorney General
3 Nevada Bar No. 11686
SCOTT H. HUSBANDS
4 Nevada Bar No. 11398
State of Nevada
5 Office of the Attorney General
5420 Kietzke Lane, Suite 202
6 Reno, NV 89511
(775) 687-2121 (phone)
7 (775) 688-1822 (fax)
Email: bprice@ag.nv.gov
8 shusbands@ag.nv.gov
Attorneys for Defendants, State of Nevada
9 *ex rel. its Department of Corrections and*
Perry Russell

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 RON SCHRECKENGOST, an individual,
13 and ELIZABETH WALSH, an individual,

14 Plaintiffs,

15 v.

16 THE STATE OF NEVADA, *ex rel.* the
NEVADA DEPARTMENT OF
17 CORRECTIONS, and PERRY RUSSELL,
an individual,

18 Defendants.
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Case No. 3:19-cv-00659-MMD-CLB

STIPULATION, REQUEST, AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFFS' FIRST AMENDED
COMPLAINT

(FIRST REQUEST)

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21 Defendants, STATE OF NEVADA *ex rel.* its DEPARTMENT OF CORRECTIONS
22 ("NDOC") and PERRY RUSSELL ("Russell"), by and through their attorneys, AARON D.
23 FORD, Attorney General for the State of Nevada, BRANDON R. PRICE, Senior Deputy
24 Attorney General, and SCOTT H. HUSBANDS, Deputy Attorney General, pursuant to LR IA 6-
25 1, LR IA 6-2, hereby submit their Stipulation, Request, and Order Extending Time to Answer or
26 Otherwise Respond to Plaintiffs' First Amended Complaint. This is the first request for an
27 extension of time to file an answer or otherwise respond to Plaintiffs' First Amended
28 Complaint.

1 Plaintiffs, RON SCHRECKENGOST and ELIZABETH WALSH (collectively
2 “Plaintiffs”), filed a Complaint (ECF No. 1) on October 30, 2019. Plaintiffs filed a First
3 Amended Complaint (ECF No. 3) on December 4, 2019. Plaintiffs’ First Amended Complaint is
4 78 pages in length, contains 342 allegations, and a total of 16 claims for relief. Defendants were
5 served the First Amended Complaint on December 16, 2019. The deadline for Defendants to
6 answer or otherwise respond to the First Amended Complaint is January 6, 2020.

7 Due to the length and complexity of the First Amended Complaint, defense counsel’s
8 pre-existing professional obligations, and Senior Deputy Attorney General Price’s previous
9 scheduled vacation during the holidays (December 23-26, 2019), Defendants need additional
10 time to prepare a responsive pleading or otherwise respond by motion to Plaintiffs’ First
11 Amended Complaint.

12 Upon agreement by and between all the parties, through their respective counsel, the
13 undersigned counsel requests that this Court grant Defendants a 30-day extension of time, up to
14 and including, February 5, 2020, to file an answer or otherwise respond by motion to Plaintiffs’
15 First Amended Complaint.

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1 By entering into this stipulation, none of the parties waive any rights they have under
2 statute, law, or rule with respect to Plaintiffs' First Amended Complaint.

3 DATED: December 19, 2019

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5 AARON D. FORD
Attorney General

THE GEDDES LAW FIRM, P.C.

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7 By: /s/ Brandon R. Price
8 BRANDON R. PRICE
9 Senior Deputy Attorney General
10 Nevada Bar No. 11686
11 SCOTT H. HUSBANDS
12 Deputy Attorney General
13 Nevada Bar No. 11398
14 Office of the Attorney General
5420 Kietzke Lane, Suite 202
15 Reno, NV 89511
16 (775) 687-2121 (phone)
17 (775) 688-1822 (fax)
18 Email: bprice@ag.nv.gov
shusband@ag.nv.gov
19 *Attorneys for Defendants, State of Nevada*
20 *ex rel. its Department of Corrections and*
21 *Perry Russell*

By: /s/ William J. Geddes
WILLIAM J. GEDDES, Esq.
Nevada Bar No. 9027
KRISTEN R. GEDDES, Esq.
Nevada Bar No. 9027
8600 Technology Way, Suite 107
Reno, NV 89521
(775) 853-9455 (phone)
(775) 299-5337 (fax)
Email: Will@TheGeddesLawFirm.com
Kristen@TheGeddesLawFirm.com
Attorneys for Plaintiffs, Ron Schreckengost
and Elizabeth Walsh

22 **ORDER**

23 IT IS SO ORDERED.

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25 UNITED STATES MAGISTRATE JUDGE

26 Dated: 12/23/2019
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